

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	
Olympia Johnson	:	Chapter 13
	:	
Debtor	:	Case No.: 17-10123-ELF

EXPEDITED MOTION TO RECONSIDER ORDER MODIFYING AUTOMATIC STAY

Comes Now, Olympia Johnson, hereinafter referred to as "Debtor" and moves this Honorable Court to vacate its September 3, 2019 Order Modifying the Automatic Stay and in support thereof avers the following:

1. The above captioned bankruptcy matter was filed as a Chapter 13 on or about January 9, 2017.
2. The Chapter 13 bankruptcy matter was assigned case number 17-10123-ELF.
3. The Chapter 13 Plan was confirmed by this Honorable Court on June 27, 2017.
4. On or about August 13, 2010, Debtor's mortgage note was secured by a reverse mortgage on the property.
5. No post-petition payments were required due to the reverse mortgage, however Debtor was required to maintain homeowner's insurance.
6. Debtor inadvertently allowed her homeowners insurance to lapse and is in the process of obtaining a new insurance policy as of the date of filing and will have the declaration page by or before the date of the hearing on this motion.
7. Additionally, Debtor is current on her Chapter 13 Plan payments to date.
8. The Debtor is humbly requesting an expedited hearing on this motion, because her residence has been scheduled for Sheriff's Sale on December 3, 2019.

9. The Debtor is desirous of keeping her real property and will pay any and all post-petition delinquencies due and owing by or before the hearing on the instant Motion.

WHEREFORE, for the reasons stated herein, the Debtor respectfully request that this Honorable Court vacate its September 3, 2019 Order Modifying the Automatic Stay.

Respectfully submitted,

Dated: November 6, 2019

/s/ Brad J. Sadek, Esquire
Brad J. Sadek, Esquire
Sadek and Cooper
1315 Walnut Street
Suite 502
Philadelphia, PA 19107